

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES OF AMERICA
ex rel. Brook Jackson,

Plaintiff,

v.

**VENTAVIA RESEARCH GROUP, LLC;
PFIZER INC.; ICON PLC,**

Defendants.

CASE NO. 1:21-CV-00008-MJT

**DECLARATION OF TARYN M. MCDONALD IN SUPPORT OF VENTAVIA
RESEARCH GROUP, LLC'S MOTION TO DISMISS AND BRIEF IN SUPPORT**

I, Taryn M. McDonald, declare as follows:

1. I am admitted to practice law in Texas and am counsel with the law firm of Haynes and Boone, LLP, counsel for Ventavia Research Group, LLC ("Ventavia") in the above-captioned litigation. I am over 18 years of age and am fully competent in all respects to make this declaration.

2. I submit this declaration in support of Ventavia's Motion to Dismiss and Brief in Support (the "Motion"). I have personal knowledge of the facts stated herein, or they are known to me in my capacity as counsel with Haynes and Boone, LLP, and each of them is true and correct to the best of my knowledge.

3. Attached hereto as Exhibit 1 is a true and correct copy of a tweet posted to Brook Jackson's Twitter page (@IamBrookJackson) on November 10, 2021. I retrieved this tweet on May 31, 2022 from: <https://twitter.com/iambrookjackson/status/1458316687133052929>.

4. Attached hereto as Exhibit 2 is a true and correct copy of a tweet posted to Brook Jackson's Twitter page (@IamBrookJackson) on January 20, 2022. I retrieved this tweet on May 31, 2022 from: <https://twitter.com/iambrookjackson/status/1484386957849337857>.

5. Attached hereto as Exhibit 3 is a true and correct copy of a tweet posted to Brook Jackson's Twitter page (@IamBrookJackson) on February 13, 2022. I retrieved this tweet on May 31, 2022 from: <https://twitter.com/iambrookjackson/status/1492974986696536068>.

6. Attached hereto as Exhibit 4 is a true and correct copy of an email exchange that Relator posted to her personal website. I retrieved this document on April 25, 2022 from www.iambrookjackson.com, but the website has apparently since been taken down.

7. Attached hereto as Exhibit 5 is a true and correct copy of a letter that Relator posted to her personal website. I retrieved this letter on April 25, 2022 from www.iambrookjackson.com, but the website has apparently since been taken down.

8. Attached hereto as Exhibit 6 is a true and correct copy of an article entitled, "Experts Blow Whistle on Alleged COVID Vaccine Whistleblower Claims," dated November 5, 2021. Employees of my firm retrieved this article on June 3, 2022 from: <https://www.medpagetoday.com/special-reports/exclusives/95484>.

9. Attached hereto as Exhibit 7 is a true and correct copy of an email exchange that Relator posted to her personal website. I retrieved this document on April 25, 2022 from www.iambrookjackson.com, but the website has apparently since been taken down.

10. Attached hereto as Exhibit 8 is a true and correct copy of a tweet posted to Brook Jackson's Twitter page (@IamBrookJackson) on May 27, 2022. I retrieved this tweet on May 31, 2022 from: <https://twitter.com/IamBrookJackson/status/1530299128558788609>.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 6, 2022.

/s/ Taryn M. McDonald

Taryn M. McDonald